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Objection Deadline:
October 3, 2008

*Counsel to SecureWorks, Inc., formerly known as
LURHQ Corporation*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

LEHMAN BROTHERS HOLDINGS, INC., *et al.*,

Debtors.

Chapter 11

Case No. 08-13555 (JMP)

**OBJECTION OF SECUREWORKS, INC., FORMERLY KNOWN AS LURHQ
CORPORATION, TO CURE AMOUNTS INCLUDED ON THE DEBTORS' LIST
OF IT CLOSING DATE CONTRACTS IN ACCORDANCE WITH THE ORDER
UNDER 11 U.S.C. §§ 105(A), 363, AND 365 AND FEDERAL RULES OF
BANKRUPTCY PROCEDURE 2002, 6004 AND 6006 AUTHORIZING AND
APPROVING (A) THE SALE OF PURCHASED ASSETS FREE AND CLEAR OF
LIENS AND OTHER INTERESTS AND (B) ASSUMPTION AND
ASSIGNMENT OF EXECUTORY CONTRACTS AND UNEXPIRED LEASES**

SecureWorks, Inc., formerly known as LURHQ Corporation ("LURHQ"),
by and through its undersigned counsel, hereby submits this objection (the "Objection"), in
accordance with the *Order Under 11 U.S.C. §§ 105(a), 363 and 365 and Federal Rules of
Bankruptcy Procedure 2002, 6004 and 6006 Authorizing and Approving (A) the Sale of
Purchased Assets Free and Clear of Liens and Other Interests and (B) Assumption and
Assignment of Executory Contracts and Unexpired Leases* [Docket No. 258] (the "Sale
Order"), to the Cure Amounts (as that term is defined in the Sale Order) included on that

certain "List of IT Closing Date Contracts" (the "Contract Schedule"). In support of this Objection, LURHQ respectfully states as follows:

BACKGROUND

1. SecureWorks, Inc. is a Georgia corporation with its headquarters in Atlanta, Georgia. SecureWorks, Inc. provides a wide range of security services to organizations of all sizes, including the Lehman Brothers Holding, Inc. ("Lehman" or "Debtor"). On December 31, 2007, SecureWorks, Inc. merged into LURHQ Corporation and the resulting entity, LURHQ Corporation, was renamed SecureWorks, Inc. Prior to the merger, LURHQ was also engaged in providing security services.

2. On March 10, 2005, LURHQ and Lehman entered into a Master Agreement for Managed Security Services (the "Master Agreement") pursuant to which Lehman purchased certain managed security services from LURHQ.

3. That Master Agreement was extended through December 31, 2008 by a Statement of Work executed between LURHQ and Lehman.

4. The Contract Schedule lists the Cure Amount for the contract between LURHQ and Lehman as "\$0.00."

OBJECTION

5. SecureWorks, Inc. objects to and seeks to correct an error in the Contract Schedule relating to the contract between LURHQ and the Debtor.

6. Exhibit A to the Contract Schedule erroneously lists the Cure Amount of the contract between LURHQ and Debtor as "\$0.00."

7. In fact, the Cure Amount is currently \$24,242.32, as evidenced by the invoices attached hereto as "Exhibit A." This cure obligation must be satisfied prior to the Debtors' assumption and assignment of the contracts with LURHQ. See 11 U.S.C. § 365 (b)(1)(A). Therefore, Exhibit A to the Contract Schedule should be modified to reflect a cure amount of \$24,242.32.

CONCLUSION

WHEREFORE, LURHQ respectfully requests that the Court enter an order correcting the Contract Schedule to show the cure amount of the contract between LURHQ and Lehman as \$24,242.32 and grant LURHQ, through its current name SecureWorks, Inc., and such other and further relief as is just and proper.

Dated: New York, New York
October 3, 2008

ZEICHNER ELLMAN & KRAUSE LLP

By: 

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